

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD JANUARY 1, 2022 THROUGH JANUARY 31, 2022**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

X Interim Fee Application No. 3 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from January 1, 2022 through January 31, 2022
(the "Third Statement Period").

Total Fees:	\$270,737.50
Total Disbursements:	\$4,764.30
Total Fees Plus Disbursements:	\$275,501.80
Minus 20% Holdback of Fees:	\$54,147.50
Amount Sought at this Time:	\$221,354.30

	<u>FEEs</u>	<u>EXPENSES</u>
Total Previous Fees Requested:	<u>\$572,096.00</u>	<u>\$3,357.32</u>
Total Fees Allowed to Date:	<u>\$572,096.00</u>	<u>\$3,357.32</u>
Total Retainer (If Applicable):	<u>0</u>	<u>0</u>
Total Holdback (If Applicable):	<u>\$114,419.20</u>	<u>0</u>
Total Received by Applicant:	<u>\$457,836.00</u>	<u>\$3,357.32</u>

Name of Professional & Title	Year Admitted	Hours	Rate	Fees
Paul R. DeFilippo, Esq., Partner	1978	69.3	\$925	\$64,102.50
James N. Lawlor, Esq., Partner	1992	93.9	\$875	\$82,162.50
Lyndon M. Tretter, Esq., Partner	1986	22.9	\$875	\$20,037.50
Joseph F. Pacelli, Esq., Associate	2020	102.4	\$580	\$59,392.00
Brian Y. Umana, Esq., Associate	2021	79.5	\$425	\$33,787.50
Stephanie A. Weaver, Law Clerk (Admission Pending)	N/A	11.2	\$340	\$3,808.00
Anthony A. Hallums, Paralegal	N/A	11.8	\$225	\$2,655.00
Michele Klinger, Paralegal	N/A	12.0	\$225	\$2,700.00
Scarlet E. Meltzer, Paralegal	N/A	4.3	\$225	\$967.50
Celenydiana Adames, Paralegal	N/A	5.0	\$225	\$1,125.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) Asset Disposition: Sales, leases, abandonment and related transaction work.	0	0
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.	0	0
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	77.7	\$39,235.00
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.1	\$58.00
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	66.4	\$36,830.50
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.	18.1	\$10,089.50
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	222.0	\$163,088.50
l) Meeting of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	3.4	\$2,857.00
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	6.4	\$4,734.50

SERVICES RENDERED	HOURS	FEES
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.	18.2	\$13,844.50
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.	0	0
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.	0	0
v) Valuation: Appraise or review appraisals of assets.	0	0
w) Travel Time	0	0
SERVICE TOTALS	412.3	\$270,737.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
01/03/2022 - Pro Hac Vice Applications for admission	\$2,100.00
01/03/2022 - Pro Hac Vice Applications for admission	\$150.00
01/03/2022 - Telephonic Court Hearing	\$50.00
01/07/2022 - J & J Court Transcribers, Inc. inv # 2022-00024 Federal Court Daily	\$217.80
01/11/2022 - J & J Court Transcribers, Inc. inv # 2022-0040 Federal court daily	\$205.70
01/12/2022 - J & J Court Transcribers, Inc. inv # 2022-00054 Federal Court Daily	\$695.75
01/14/2022 - Court Solutions-Attendance Fee	\$50.00
01/20/2022 - Court Solution Telephonic Appearance Fee	\$50.00
01/20/2022 - Pro hac vice application for admission for an attorney at the Jones Day law firm	\$150.00
01/20/2022 - J & J Court Transcribers, Inc. inv # 2022-00103	\$574.75
01/25/2022 - J & J Court Transcribers, Inc. inv # 2022-00136	\$314.60
01/26/2022 - J & J Court Transcribers, Inc. inv # 2022-00150 Federal Court Daily	\$205.70
DISBURSEMENTS TOTALS	\$4,764.30

SECTION IV CASE HISTORY

1. Date of Retention: December 16, 2021, effective as of November 12, 2021 [Dkt. 851] (the “Retention Order”).¹
2. Summary explaining the nature of the work performed and the results achieved:
 - Facilitated the drafting, finalization and filing of (i) several motions, objections and responses, including the motion to extend the exclusivity period for filing of a chapter 11 plan and disclosure statement, motion for an order determining that United States Trustee’s reconstitution of the TCC was invalid, opposition to motion to lift stay, opposition to retention applications of TCC I and TCC II, responses related to retention applications of the Debtor’s professionals, and response regarding reconstitution of the TCC (ii) consent orders establishing discovery procedures in contested matters, (iii) monthly fee statements for the Debtor’s professionals, (iv) certifications of no objection regarding monthly fee statements, (v) letters to the Court regarding reconstitution of the TCC, motion to lift stay, discovery issues in connection with the motions to dismiss, extension of the preliminary injunction, and motion to withdraw the reference, (vi) Debtor’s monthly operating report, (vii) applications for admission *pro hac vice*, and (viii) documents related to retention of the Debtor’s professionals; (ix) hearing agendas;
 - Analyzed issues and counseled the Debtor with respect to, among other things, (i) reconstitution of the TCC, (ii) retention of the Debtor’s professionals, (iii) motions to dismiss, (iv) motion to lift stay, and (v) extension of the preliminary injunction;
 - Participated in several hearings and discovery conferences held during this period and counseled the Debtor with respect thereto, including the requirements of the local bankruptcy rules;
 - Reviewed discovery demands served on the Debtor in connection with pending motions to dismiss;
 - Conducted legal research regarding several current and future aspects of the Debtor’s reorganization including mass tort bankruptcy administration and litigation;
 - Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor’s administrative processes, including adherence to the local bankruptcy rules and filing procedures.

¹ The Retention Order is attached hereto as Exhibit A.

I certify under penalty of perjury that the above is true.

Date: February 10, 2022

/s/ Paul R. DeFilippo
Paul R. DeFilippo